

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

BOSCH SOLAR ENERGY CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:20-cv-13390
	)	
Korea Steel Company, Ltd., a/k/a	)	Hon. Stephen J. Murphy
KISCO, a corporation existing under the	)	
laws of the Republic of Korea,	)	Mag. Judge Anthony P. Patti
	)	
Defendant.	)	
	)	

**JOINT MOTION TO EXTEND THE COURT'S DEADLINE**  
**FOR FILING OF CLOSING PAPERS**

Plaintiff Bosch Solar Energy Corp., (“Bosch Solar”) and Defendant Korea Steel Company, Ltd., a/k/a KISCO, (“KISCO”), through their undersigned counsel, hereby jointly move for an extension to file closing papers in this case. This is the parties’ second such request. In support, the parties rely on the papers on file with the Court, and further state:

1. As stated at ¶¶1-6 of the parties’ first joint motion requesting an extension, filed June 17, 2022 (Dkt. 19), and granted via text order on June 21, 2022 (Dkt. 20):

- This case was filed in December 2020, and throughout 2021, Bosch Solar attempted to perfect service on KISCO at KISCO’s offices in the Republic of Korea.
- In March 2022, KISCO filed a motion to dismiss the complaint.

- Amidst the briefing on that motion, the parties advised the Court that they had reached an agreement in principle to settle the case.
- On May 5, 2022, the Court entered an order dismissing the case without prejudice and further ordered “the parties to file closing documents dismissing the case with prejudice no later than June 17, 2022.” ECF No.18, PageID.555.
- The parties have worked diligently to finalize the settlement agreement. However, key individuals reside in foreign countries, which has slowed the process.
- Nevertheless, the settlement agreement is in final form and is expected to be executed in the near future, and the terms of the settlement agreement are expected to take effect by the end of July.

2. For those reasons, the parties requested an extension to July 31, 2022, to file closing papers dismissing this case with prejudice. The Court granted that request on June 21.

3. Over the past month, the language in the settlement agreement has been nearly finalized. However, the parties require more time due to complications relating to the transfer of funds.

4. The parties agreed to structure the agreement to avoid unnecessary complications, and KISCO is now taking steps to obtain the necessary regulatory approval.

5. The parties have conferred, and Bosch Solar is agreeable to seeking an additional extension so that KISCO can obtain the regulatory approval it is seeking.

6. As such, the parties respectfully request an extension from July 31, 2022, until August 19, 2022.

So Stipulated

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